



# South Carolina

## DEPARTMENT OF CONSUMER AFFAIRS

293 Greystone Boulevard Suite 400  
P. O. BOX 5757  
COLUMBIA, SC 29250-5757

Carri Grube Lybarker  
Administrator/  
Consumer Advocate

**PROTECTING CONSUMERS SINCE 1975**

Commissioners  
David Campbell  
Chair  
Columbia  
W. Fred Pennington, Jr.  
Vice Chair  
Simpsonville  
Mark Hammond  
Secretary of State  
Columbia  
William Geddings  
Florence  
James E. Lewis  
Myrtle Beach  
Renee I. Madden  
Columbia  
Jack Pressly  
Columbia  
Lawrence D. Sullivan  
Summerville

June 18, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Docket No. 2021-153-S  
Application of Palmetto Wastewater Reclamation, Inc. for Adjustment of Rates and  
Charges (Increase) and Terms and Conditions of Sewer Service.

Dear Ms. Boyd:

Please find enclosed for filing the Petition to Intervene on behalf of the South Carolina  
Department of Consumer Affairs. As indicated on the Certificate of Service, all parties of record  
will be served via electronic mail.

Regards,

Roger Hall, Esq.  
*Deputy Consumer Advocate*

Enclosures

Cc: Parties of Record (via email)

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-153-S**

IN RE:

Application of Palmetto Wastewater  
Reclamation, Inc. for Adjustment of Rates  
and Charges (Increase) and Terms and  
Conditions of Sewer Service

**PETITION TO INTERVENE**

Carri Grube Lybarker, Administrator and Consumer Advocate for the South Carolina Department of Consumer Affairs (“Department”), respectfully petitions the South Carolina Public Service Commission (“Commission”) for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. Palmetto Wastewater Reclamation, Incorporated has filed an application with the Commission requesting approval for an adjustment of rates and charges and terms and conditions of sewer service to its customers.

2. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Department may provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service Commission. In that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 2021-153-S.

3. The Department works to avoid excessive, inadequate, and unwarranted rate increases; however, a position has not yet been fully developed on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

4. Counsel representing the Consumer Advocate/Department in this proceeding are:

Carri Grube Lybarker, Esquire  
Roger P. Hall, Esquire  
Connor J. Parker, Esquire  
**S.C. Department of Consumer Affairs**  
293 Greystone Blvd., Suite 400  
P.O. Box 5757  
Columbia, South Carolina 29250-5757  
Phone: (803) 734-0045  
Email: [clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)  
Email: [rhall@scconsumer.gov](mailto:rhall@scconsumer.gov)  
Email: [cjparker@scconsumer.gov](mailto:cjparker@scconsumer.gov)

5. The Consumer Advocate/Department consents to service via electronic mail and requests all communications regarding this docket be directed to counsel of record noted above.

**WHEREFORE**, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests the Commission grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire  
Administrator / Consumer Advocate

By: s/ Carri Grube Lybarker  
S.C. Department of Consumer Affairs  
293 Greystone Blvd., Suite 400  
P.O. Box 5757  
Columbia, South Carolina 29250-5757  
Phone: (803) 734-0045

June 18, 2021  
Columbia, South Carolina

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-153-S**

IN RE:

Application of Palmetto Wastewater  
Reclamation, Inc. for Adjustment of Rates  
and Charges (Increase) and Terms and  
Conditions of Sewer Service

**CERTIFICATE OF SERVICE**

I hereby certify I have caused to be served this day the **Petition to Intervene** to the individuals listed below via electronic mail as follows:

**Palmetto Wastewater Reclamation,  
Incorporated**

Charles L.A. Terreni, Esquire  
[charles.terreni@terrenilaw.com](mailto:charles.terreni@terrenilaw.com)

**Office of Regulatory Staff**

Christopher M. Huber  
Jenny R. Pittman  
[chuber@ors.sc.gov](mailto:chuber@ors.sc.gov)  
[jpittman@ors.sc.gov](mailto:jpittman@ors.sc.gov)

s/ Eliza Mecaj

Eliza Mecaj, PP

June 18, 2021  
Columbia, South Carolina